



MISSOURI ETHICS COMMISSION

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(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

June 6, 2017

David Thompson
430 E Wood Street
Troy MO 63379

Re: File No. 17-0015-I

Dear Mr. Thompson:

The Missouri Ethics Commission considered the complaint filed against you at its June 5, 2017 meeting. You serve as Treasurer of the Lincoln County Resource Board. The complaint alleged that you failed to report information on your personal financial disclosure statements filed with the Missouri Ethics Commission. The complaint also alleged that you had a conflict of interest while serving on the board and also serving as President of People's Bank and Trust because the board maintains bank accounts with People's Bank and Trust.

Staff review of this complaint determined that you have served on the Lincoln County Resource Board for approximately 10 years. The Board was established after voters in Lincoln County approved a ¼ cent sales tax to be collected by Lincoln County and administered by the Board. During your time on the Board, you also served as President of People's Bank and Trust.

The Board has an ordinance requiring certain Board officers, including the Treasurer, to file a personal financial disclosure statement each year with the Missouri Ethics Commission. You filed your personal financial disclosure each year since the Board adopted the ordinance. The complaint alleged that the disclosure did not fully report your financial interests. Staff determined that, in one instance, you failed to list an interest in Troy Development Company in which you have more than 10% interest. You have amended your filing to now reflect that interest and the staff determined that the error was inadvertent.

Staff also reviewed the allegation regarding your alleged conflict of interest. Under Section 105.454.1(3), RSMo, an elected or appointed official of the state or any political subdivision is not allowed to participate in certain matters when the official knows that participating may result in the official or official's business receiving more than \$500 per transaction or \$5,000 per year. Staff review determined that you received no monetary benefit as a result of the Board maintaining its bank accounts with People's Bank and Trust.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 105, RSMo, and is dismissing the complaint.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Klahr".

James Klahr
Executive Director